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Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

93-DOE-09637

AUG 31 1993

ACTION
DIST. LTR ENC

ENEDETTI, R.L.	
ENJAMIN, A.	
ERMAN, H.S.	
ARNIVAL, G.J.	
OPP, R.D.	
ORDOVA, R.C.	
AVIS, J.G.	
ERRERA, D.W.	
RANZ, W.A.	
ANNI, B.J.	
EALY, T.J.	
EDAHL, T.G.	X
ILBIG, J.G.	
IRBY, W.A.	
UESTER, A.W.	
TANN, H.P.	
IARX, G.E.	
ICKENNA, F.G.	
IORGAN, R.V.	
IZZUTO, V.M.	
OTTER, G.L.	
HILEY, J.H.	
ANDLIN, N.B.	
ATTERWHITE, D.G.	
SCHUBERT, A.L.	
SETLOCK, G.H.	X
SULLIVAN, M.T.	
SWANSON, E.R.	
VILKINSON, R.B.	
VILSON, J.M.	

Hutchins N X

Ward D X

Marshall S X

Pettis S X

Adm Rec. X

CORRES CONTROL	x	x
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP

9-1-93
DATE BY

Ref Ltr. #

DOE ORDER # 5400

Mr. J. David Holm
Water Quality Control Division
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Holm;

The purpose of this letter is to respond to issues stated in your letter dated July 28, 1993, concerning discharges from the terminal ponds at the Rocky Flats Plant.

Ethylhexyl Phthalate (Bis-2):

Currently, the Environmental Protection Agency (EPA) has proposed a drinking water standard of 6 µg/L for ethylhexyl phthalate (bis-2). Although this compound has been detected in pond waters at the plant, it has also been found above the proposed standard in samples taken from the local cities' raw and finished waters, and in laboratory blanks analyzed by the Colorado Department of Health (CDH). Ethylhexyl phthalate (Bis-2) is used in plastics, and is a common contaminant. Before any discussions between the Department of Energy/Rocky Flats Office, (DOE/RFO), CDH, EPA, and the local communities occur on an "appropriate" standard for this compound, it would be advantageous for both CDH and DOE/RFO to gather more information and analytical input on this compound to ensure that any standard developed is truly indicative of pollution, and protective of human health and the environment as prescribed by the Colorado Water Quality Control Commission rules and regulations.

U.S. Army Corps of Engineers Report on Terminal Pond Dam Stability:

The final report prepared by the U.S. Army Corps of Engineers (COE) on the stability of the dams at terminal ponds on plant-site was delivered to DOE/RFO in July 1993. After an internal reporting is made to upper management at the plant, a presentation will be scheduled with cognizant personnel at CDH and with the State Engineers Office. Since modified pond operations may be required, these operational plans will also be discussed at that time.

Surface Water Management Plan:

Water from such sources as operable unit (OU) discharges, sewage treatment plant effluent, stormwater, incidental waters, and other sources of water on plant site are channeled into the A and B series ponds in the Walnut Creek Basin, and into Pond C-2 in the Woman Creek Basin. The ponds are not used as dilution basins; they are used to prevent uncontrolled discharges, and to isolate and test all water before it leaves the plantsite, as prescribed in the Agreement in Principle between DOE and the state of Colorado. As stated to your staff previously, a draft Surface Water Management Plan was being finalized last year at the time the request from CDH and EPA was issued to DOE/RFO to prepare an Interim Measure/Interim Remedial Action (IM/IRA) for pond water management. Until the decision to implement the Pond Water Management IM/IRA is made, it would be premature to make permanent decisions and plans on management practices for all surface waters on plant site.

ROCKY FLATS PLANT
CORRESPONDENCE

SEP 1 2 06 PM '93

Mr. J. David Holm
93-DOE-09637

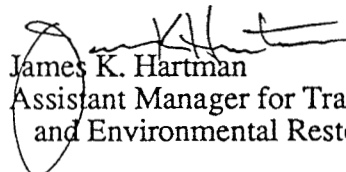
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Releases from clean-up activities:

DOE/RFO and EG&G have been diligent in managing surface water at the plant as evidenced by concurrence with CDH as to the safety of pond water discharges for the last two and a half years, and, in most cases, meeting Segment 4 stream standards without treatment. All operable unit (OU) discharges to surface waters on plant site are agreed to by CDH and EPA under the Interagency Agreement (IAG), and must meet applicable or relevant and appropriate requirements (ARARs). The DOE/RFO and EG&G divisions responsible for surface water quality have been working with the Environmental Restoration staffs to monitor the OU discharges for possible impacts on surface water quality. If the Water Quality Control Division of CDH feels these discharges to surface waters are inappropriate, further discussions with the Resource Conservation and Recovery Act (RCRA) Division of CDH concerning renegotiation of the IAG may be warranted.

We will keep you informed of the pond release status, and any significant events that may occur affecting the pond discharges. If you have any questions or comments regarding this response, please contact Al Howard at 966-5915, or Gail Hill at 966-3424.

Sincerely,


James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

cc:

J. Bruch, WQCD, CDH
S. Tarlton, RFPD, CDH
R. Shankland, EPA
R. Schassburger, ERD, RFO
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M. Roy, OCC, RFO
A. Howard, EPD, RFO
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